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Hon. Paul A. Engelmayer  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

May 10, 2024

**Re: Jane Street Group, LLC v. Millennium Management LLC, Douglas Schadewald,  
and Daniel Spottiswood, No. 1:24-cv-02783**

Dear Judge Engelmayer:

I write on behalf of Defendants Douglas Schadewald (“Schadewald”) and Daniel Spottiswood (“Spottiswood,” and together with Schadewald, “Individual Defendants”). Pursuant to Local Civil Rule 7.1(d) and Individual Practice Rule 4.B, we seek permission to file under seal Individual Defendants’ Answer, Affirmative Defenses, and Counterclaims (the “Answer and Counterclaims”).

Individual Defendants believe that the Answer and Counterclaims should be made public in their entirety. As Plaintiff has still not disclosed the alleged trade secret at issue in this case and the filings in this case to date concerning Jane Street’s business activities have been at a very high level of generality, the Individual Defendants do not believe the Answer and Counterclaims contain any information that would constitute a “trade secret or other highly confidential business information” sufficient to outweigh the presumption of public access. *See TileBar v. Glazzio Tiles*, 2024 WL 1186567, at \*27 (E.D.N.Y. Mar. 15, 2024). Moreover, the weight of the presumption of public access is “heavy” as the Answer and Counterclaims are a pleading of central importance to the judicial function. *Under Seal v. Under Seal*, 273 F. Supp. 3d 460, 470 (S.D.N.Y. 2017).

Nevertheless, out of an abundance of caution in light of Plaintiff’s pending motion for leave to seal portions of the Amended Complaint to which the Answer and Counterclaims respond (D.I. 62), Individual Defendants seek leave to file their Answer and Counterclaims under seal. Individual Defendants will meet and confer with Jane Street regarding any redactions Jane Street believes are necessary and warranted by law, and file a public version of the Answer and Counterclaim by close of business on Tuesday, May 14, 2024. Individual Defendants reserve the right to challenge any redactions proposed by Jane Street.

Respectfully submitted,

/s/ Brian R. Campbell

Brian R. Campbell

GRANTED.

SO ORDERED.

Dated: May 13, 2024  
New York, New York

  
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PAUL A. ENGELMAYER  
United States District Judge